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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WILLIAM CRAWFORD, JR.,

Petitioner(s),

vs.

JERRY HOWELL, *et al.*,

Respondent(s).

Case No. 2:19-cv-01574-RFB-BNW

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)**

Respondents, by and through counsel, AARON D. FORD, Attorney General of the State of Nevada, respectfully move this Court for an order granting a sixty (60) day enlargement of time, to and including May 28, 2021, in which to file and serve their response to William Crawford, Jr.'s second amended petition for writ of habeas corpus.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

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This is undersigned counsel's first request for an enlargement of Respondents' time to file said response; the motion is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case; and the Federal Public Defender has indicated he has no objection.

RESPECTFULLY SUBMITTED this 25th day of March, 2021.

AARON D. FORD
Attorney General

By: /s/ Sheryl Serreze
SHERYL SERREZE (Bar No. 12864)
Deputy Attorney General

ORDER

IT IS SO ORDERED.

Dated this ____ day of _____, 2021.

DISTRICT COURT JUDGE

1 AARON D. FORD
2 Attorney General
3 SHERYL SERREZE (Bar No. 12864)
4 Deputy Attorney General
5 State of Nevada
6 Office of the Attorney General
7 100 North Carson Street
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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 WILLIAM CRAWFORD, JR.,

11 Petitioner(s),

12 vs.

13 JERRY HOWELL, *et al.*,

14 Respondent(s).

Case No. 2:19-cv-01574-RFB-BNW

DECLARATION OF COUNSEL

15 I, SHERYL SERREZE, hereby state, based on personal knowledge and/or information and
16 belief, that the assertions of this declaration are true:

17 1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of
18 Nevada in the Bureau of Criminal Justice, Post-Conviction Division, and I make this declaration on behalf
19 of Respondents' motion for enlargement of time.

20 2. On January 27, 2021, William Crawford, Jr. filed his second amended petition for writ of
21 habeas corpus, along with exhibits in support thereof. ECF Nos. 19, 20-1 through 20-6.

22 3. By this motion, I am requesting a sixty (60) day enlargement of time, to and including
23 May 28, 2021, in which to file and serve the response to Crawford's second-amended petition. This is my
24 first request for enlargement.

25 4. The response is currently due March 29, 2021.

26 5. Although the necessary documents were timely requested from Eighth Judicial District
27 Court, as of the date of filing this motion the index in this case has not yet been fully assembled.

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1 6. Therefore, although undersigned counsel has been working diligently, she respectfully
2 submits that additional time is required to adequately respond to Crawford's second-amended petition.

3 7. As such, I request a sixty (60) day enlargement of time, to and including May 28, 2021,
4 in which to file and serve the response to Crawford's second-amended petition. This is Respondents'
5 first request for enlargement.

6 8. Jeremy Baron, the Assistant Federal Public Defender assigned to this case, has indicated
7 that he has no objection to this request for an enlargement of time, although the lack of objection is not
8 to be considered a waiver or concession of any kind.

9 9. This motion for enlargement of time is made in good faith and not for the purpose of
10 unduly delaying the ultimate disposition of this case.

11 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the
12 foregoing is true and correct.

13 Dated: 3/25/2021

14 _____
15 /s/ Sheryl Serreze
16 SHERYL SERREZE

17 IT IS SO ORDERED:

18 
19 _____
20 RICHARD F. BOULWARE, II
21 United States District Judge
22 DATED this 26th day of March, 2021.

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 25th day of March, 2020, I served a copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST), by U.S. District Court CM/ECF electronic filing to:

Jeremy C. Baron
Assistant Federal Public Defender
411 E. Bonneville Ave., Suite 250
Las Vegas, Nevada 89101

/s/ Laurie Sparman